

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. LBR 9004-1(b)

COOLEY LLP

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*Counsel for the Ad Hoc Group of Tort
Claimants*

In re:

New England Motor Freight, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-12809 (JKS)

**NOTICE OF APPEARANCE AND REQUEST FOR
SERVICE OF ALL NOTICES AND PLEADINGS**

PLEASE TAKE NOTICE that the Ad Hoc Group of Tort Claimants (the “Claimants”) consisting of those certain tort claimants identified on **Schedule A** hereto, each by and through his/her respective litigation counsel of record and their collective bankruptcy counsel, Cooley LLP, hereby appears in the above-captioned cases pursuant to 11 U.S.C. §§ 342(a) and 1109(b) (the “Bankruptcy Code”) and Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and hereby requests that copies of all notices and pleadings given, required to be given or filed in the above-captioned cases be given and served upon:

¹ The Debtors in these Chapter 11 cases and the last four digits of each Debtor’s taxpayer identification number as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

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PLEASE TAKE FURTHER NOTICE that pursuant to 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any order and notice of any application, motion, petition, pleading, request, complaint or demand, whether former or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, overnight carrier, facsimile transmission, email or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any later appearance, pleadings, claim or suit shall be deemed or construed to be a waiver of the rights of the Claimants: (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge; (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) of any other rights, claims, actions, defenses, setoffs, or recoupments to which the Claimants are or may be entitled

under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 10, 2019

COOLEY LLP

/s/ Richard S. Kanowitz
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Schedule A

Hecht, Kleegeer & Damashek, PC

- Esmeralda Ramirez

Kramer, Dillof, Livingston & Moore

- Susan Volpe
- Raymond Volpe

Finkelstein & Partners, LLP

- Joseph Varsik, Jr.
- Joseph Carney

Block O'Toole & Murphy, LLP

- Kareem A. Mills
- Melissa Walker, Individually and as Administrator of the Estate of Khalil Walker, Deceased
- Melissa Walker, Individually and as Administrator of the Estate of Henry Walker, Deceased

CERTIFICATE OF SERVICE

I, Evan Lazerowitz, hereby certify that on April 10, 2019, I caused to be electronically filed the **Notice of Appearance and Request for Service of All Notices and Pleadings**, which is being served electronically via the Court's ECF system on all parties that have consented to electronic service of all court filings.

/s/Evan Lazerowitz